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UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS

In Re:

John Malone, Debtor

Chapter 13 Case No. 24-10885

RESPONSE TO FEDERAL HOME LOAN MORTGAGE COMPANY'S RESPONSE TO DEBTOR'S MOTION TO SELL

Now comes the Debtor and responds to Federal Home Loan Mortgage Company's Response to Debtor's Motion to Sell as follows:

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Neither admitted nor denied as to the amount of post-petition arrears, as Debtor is uncertain as to the amount. Debtor acknowledges that the mortgage to Federal Home Loan Mortgage Company needs to be paid from the sale of the real estate and has provided for that in his proposed Order.
- 7. Debtor acknowledges that the mortgage to Federal Home Loan Mortgage Company needs to be paid from the sale of the real estate and has provided for that in his proposed Order.
- 8. Denied, as all communications should go through Debtor's counsel and not directly with Debtor.
- 9. Neither admitted nor denied as no response is required.

Wherefore, the Debtor requests the Court find as follows:

- 2. Federal Home Loan Mortgage Company's Response be denied.
- 2. For such other relief as the Court deems just.

Debtor, by his attorney,

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Dated: November 18, 2025

/s/ John Ullian
John Ullian, Esq. BBO# 542786
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CERTIFICATE OF SERVICE

I, John Ullian, hereby certify under the pains and penalties of perjury that I served the **RESPONSE TO FEDERAL HOME LOAN MORTGAGE COMPANY'S RESPONSE TO DEBTOR'S MOTION TO SELL** by ECF or by mailing a copy of same, postage prepaid, to the following interested parties:

Richard King Office of the US Trustee J.W. McCormack Post Office & Courthouse 5 Post Office Sq., 10th Fl, Suite 1000 Boston, MA 02109

John Malone 28 Savin Hill Avenue Dorchester, MA 02125

Federal Home Loan Mortgage Corporation Jason Giguere Zwicker & Associates, P.C. 80 Minuteman Road Andover, MA 01810

Dated: November 18, 2025

Carolyn Bankowski Chapter 13 Trustee Boston P. O. Box 8250 Boston, MA 02114

Federal Home Loan Mortgage Corporation Brian M Kiser Marinosci Law Group, P.C. 275 West Natick Road, Suite 500 Warwick, RI 02886 Federal Home Loan Mortgage Corporation Joseph Dolben Harmon Law Offices, P.C. 150 California Street Newton, MA 02458

/s/ John Ullian

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